



Connecticut Chapter
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Dear Co-Chairs Needleman and Arconti, Vice-Chairs Fonfara and Allie-Brennan, Ranking Members Formica and Ferraro, and members of the Energy & Technology Committee,

On behalf of the Sierra Club and our more than 11,000 members and 30,000 supporters in Connecticut, thank you for the opportunity to testify on SB 889, HB 7156 and SB 875.

These bills have the potential to increase clean and renewable energy in the state and to reduce greenhouse gas emissions, actions that are urgently needed to address the issue of climate change. The UN IPCC¹ report and the Fourth National Climate Assessment², reports released in 2018, clearly spelled out the economic and public health consequences of inaction - poor air quality leading to increased deaths, lost coastline, dangerously hot summers, infrastructure damaged by flash flood and more. By rapidly increasing clean and renewable energy generation like solar and wind, as well as reducing the damage done by fossil fuels, we can address climate change. But, we must take bold action and we must do it quickly.

S.B. No. 889 (RAISED) AN ACT CONCERNING THE PUBLIC UTILITIES REGULATORY AUTHORITY'S INVESTIGATION OF LOST AND UNACCOUNTED FOR GAS

This bill requires PURA to open a docket to investigate a gas company if more than 1.5% of gas is leaked. It is crucial that Connecticut gain control of this problem. Leaking methane from our gas infrastructure is extremely harmful to our environment and to human health, and is an impediment to achieving mandated greenhouse gas reduction targets. Given the urgent need to reduce greenhouse gas emissions to avoid the worst impacts of climate change, Sierra Club Connecticut strongly urges the legislature to adopt policies to address the problems “natural” gas pose to our state’s climate and clean energy policy goals. These problems with gas include leaks, disincentivizing repair by charging ratepayers for lost and unaccounted for gas, allowing ratepayer charges for conversions to gas and new pipelines, and continued approval of new unneeded infrastructure like compressor stations and gas plants that lock us into gas for the long term.

The problem

Methane is a short term pollutant and greenhouse gas which is wreaking havoc on our climate. “Natural” gas is 97% methane combined with trace other gases and components that remain from the drilling process. Methane is the second most common greenhouse gas (GHG) in our atmosphere and by far the most damaging. Over 10 years, methane is 100 times more effective at trapping heat in the atmosphere than carbon dioxide, the most common GHG. The extraction, transport and use of methane result in a high number of leaks, both fugitive and intentional. Due to the cumulatively large amount of emissions over the lifecycle of methane, this fossil fuel is worse for the climate even than burning coal or oil.^{3&4}

¹ <https://www.ipcc.ch/>

² <https://nca2018.globalchange.gov/>

³ methane emissions and the greenhouse gas footprint of natural gas
https://www.eeb.cornell.edu/howarth/.../Howarth_2014_ESE_methane_emissions.pdf

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Gas leaks are a barrier to achieving Connecticut's GHG emission reduction mandates. Sec. 22a-200a of the Connecticut General Statutes requires that we reduce GHG emissions to at least 45 percent below the level emitted in 2001 by 2030, and to at least 80 percent below the level emitted in 2001 by 2050. The UN IPCC⁵ report and the Fourth National Climate Assessment⁶ released in 2018 highlighted the urgency of drastically reducing GHG emissions by 2030. In neighboring Massachusetts, a study by the Conservation Law Foundation showed that the state is losing more gas from leaks than they are saving through energy efficiency programs.⁷

Leakage rate much higher when measured objectively

In response to growing knowledge that methane leaks were underestimated, Sierra Club Connecticut undertook an objective study in 2016, using the best equipment to measure leaks in Hartford, then comparing that to PURA gas leaks data. Our proactive and objective study found a much higher rate of leaks than was reflected in the PURA data. We obtained the PURA data directly from the agency itself. The leaks from just the city of Hartford pipelines alone is enough to heat 214 homes for a year.⁸

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Objective and proactive measurement is superior to self-report

A system that doesn't go out looking but learns about leaks retrospectively will not find all the leaks. It is not designed to. The majority of gas studies have found what our study found, that proactive leak surveys find a higher number of leaks than are noted in regulatory reports. In their 2018 testimony on a gas leaks bill before this committee, PURA discuss "leak surveys" but it is nowhere stated when these are done, if they are required to be done and at what intervals¹⁰

Payment for leaks may disincentivize repair

The provision in PA14-152 that creates a cost mechanism for ratepayers to pay for lost and unaccounted gas, disincentivizes repair. Last year PURA opposed reducing allowable leak rate because it could have significant ratepayer impacts. But the current law allows gas companies to bill customers for "lost and unaccounted for gas." That payment should have been used to repair gas leaks. It is not clear why gas companies would need more money to fix leaks that they have charged to ratepayers for years.

We ask that you ensure as this bill progresses, that the language results in less gas leaked, more accountability for repairs, and less costs to the ratepayer. We seek an amendment to this bill to set a threshold of 1% rather than 1.5%, which is still an alarming amount of methane leaking, but aligns with a similar bill, SB 232, sets the threshold for repairs at a preferable 1%.

⁵ <https://www.ipcc.ch/>

⁶ <https://nca2018.globalchange.gov/>

⁷ <https://www.clf.org/wp-content/uploads/2016/03/CLF-Into-Thin-Air.pdf>

⁸ Hartford, CT Mobile Methane Leak Survey by Connecticut Chapter ...
https://issuu.com/ctsierraclub/docs/hartford_ct_mobile_methane_leak_su

⁹ CT regulators ignore health and climate destroying methane leaks ...
<https://www.darientimes.com/.../ct-regulators-ignore-health-and-climate-destroying-m...>

¹⁰ Methane emissions from natural gas infrastructure and use in ... - PNAS
<https://www.pnas.org/content/112/7/1941>



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H.B. No. 7156 (RAISED) AN ACT CONCERNING THE PROCUREMENT OF
ENERGY DERIVED FROM OFFSHORE WIND &
S.B. No. 875 AN ACT EXPANDING CONNECTICUT'S OFFSHORE WIND ENERGY PORTFOLIO.

These two offshore wind bills increase allowable procurement,. We recommend that Connecticut set itself on a path of at least 2,000 MW of offshore wind by 2030, and that these bills be amended to do that. Offshore wind is critical to reach our renewable portfolio standard and diversify our energy generation. We are already behind our neighboring states and may lose out of the offshore wind jobs that come with large procurement. New York has a goal of 9,000 megawatts of offshore wind by 2035 and has solicited bids for the first 800 megawatts; Massachusetts is poised to double its current goal of 1,600 megawatts by 2027, and 800 megawatts has already been purchased.

Sierra Club Connecticut supports both bills' labor provisions that will ensure offshore wind jobs are high-quality jobs with health and safety protections.

We also want to ensure that environmental protections are in place. At a minimum, the legislation should require the DEEP Commissioner to consider whether submitted proposals contain explicit descriptions of the best management practices to be employed, as informed by the latest science at the time of a proposal, to avoid, minimize, and mitigate impacts to wildlife, natural resources, ecosystems, and traditional or existing water dependent uses.

Regarding HB 7155, Sierra Club Connecticut recommends that residential electric service plans available to customers of Eversource and UI always include options for far more renewable energy than the minimum required by the state.

We look forward to working with you as you develop these proposed bills, and we thank you for your consideration of our testimony.

Ann Gadwah, Chapter Chair
Samantha Dynowski, State Director
Martha Klein, Executive Committee
Sierra Club Connecticut